

Blackpool Local Plan Part 2: Site Allocations and Development Management Policies

Regulation 18 Consultation Report

December 2017

Blackpool Council



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1 Introduction

1.1 This **Consultation Report** sets out the information required under Regulation 18 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and also confirms that consultation has been carried out in accordance with the requirements of Blackpool Council's Statement of Community Involvement.

Statement of Community Involvement

1.2 Section 18 of the Planning and Compulsory Purchase Act 2004 requires Council's to prepare a Statement of Community Involvement.

1.3 The Council's Statement of Community Involvement (SCI) was adopted in November 2014 and confirms the Council's commitment to engage with stakeholders and the local community during the plan making process and the methods in which the Council will carry out consultation. It can be viewed at www.blackpool.gov.uk/sci

The Local Plan Part 2: Site Allocations and Development Management Policies Document

1.4 The Council has started preparing the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document (from now on referred to as 'Local Plan Part 2'). Figure 1 illustrates the preparation stages.

1.5 The Local Plan Part 2 will:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
- Designate areas where particular policies will apply e.g. local centres
- Include policies to be applied when considering applications for development e.g. design, amenity and transport



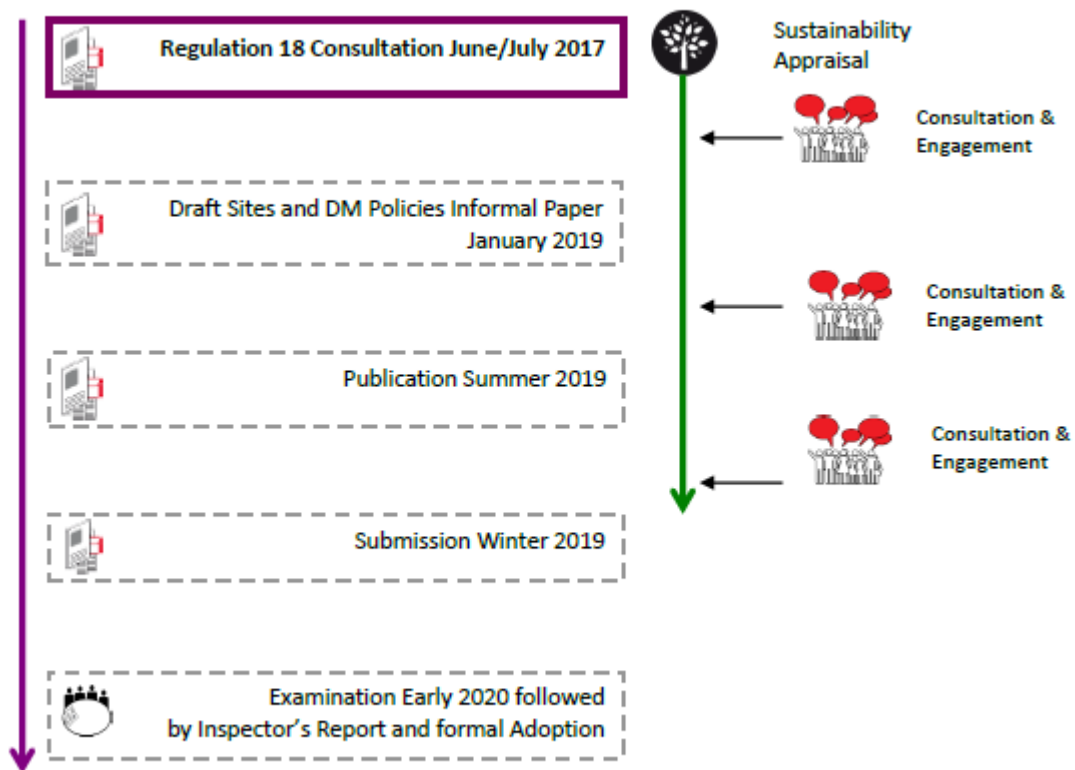


Figure 1: Local Plan Part 2 Preparation Stages

1.6 Separate appendices can be found at the end of the report which provide further details of consultation material and responses.

1.7 This report will be further updated as the Local Plan Part 2 progresses to submission stage.

Evidence Base

1.8 Throughout all stages of the Local Plan Part 2, various evidence base documents will be made available for people to view on the Council's website. This includes Annual Monitoring reports, Housing Monitoring reports and the Blackpool Retail, Hotel and Leisure Study. Further information can be found at <http://www.blackpool.gov.uk/evidencebase>

Sustainability Appraisal

1.10 The 'Sustainability Appraisal' (SA) is required by Section 19(5) of the Planning and Compulsory Purchase Act 2004.

1.11 The process began in January 2017 with the preparation of an SA Scoping Report for the Local Plan Part 2. This set out the scope of the SA, established baseline information and identified key sustainability issues and opportunities. The sustainability objectives were developed at this stage. The Scoping Report was issued to statutory consultees for the mandatory five-week period. Comments were incorporated into subsequent stages.

2 Regulation 18 Scoping Consultation

2.1 The Regulation 18 Scoping Document was approved by Blackpool Council's Executive Committee on 24th April 2017, and was subject to extensive public consultation from 12th June 2017 until 24th July 2017.

2.2 This is the first consultation stage of the Local Plan Part 2 preparation process. The Council is seeking views on what policies the document ought to contain to ensure we have the right planning policies for Blackpool. We identified a number of policy titles and invited comments on the policies we propose to include in the plan and any additional policies that should be included in the plan.

Consultees

2.4 A wide range of local and national interest groups and organisations were consulted in accordance with the relevant consultation regulations.

2.5 The Council's Local Plan consultation database included all the relevant statutory consultees and other non-statutory consultees. Non-statutory consultees included key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the consultation and invited them to make comments. This email provided a link to the Council's Local Plan webpage. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix B.

2.7 A list of the specific and general consultation bodies can be viewed in Appendix A.

Methods of Consultation

Local Press

2.8 A formal notice was published in the Blackpool Gazette on 12th June 2017.

Website

2.11 Once the consultation had commenced, the Regulation 18 Scoping Document was available to view on the Council's website, along with other evidence base documents and the accompanying Sustainability Appraisal Scoping Report.

Library and Council Offices

2.12 The Regulation 18 Scoping document and accompanying Sustainability Appraisal Scoping Report were made available at the Customer First Centre and all libraries across the Borough. Response forms were also available to complete and return to the Planning Department.

2.13 Hard copies of the Regulation 18 Report, Sustainability Appraisal and all other evidence base documents were also available on request from the Planning Department.

Responses to the Consultation

2.16 35 organisations/individuals responded to the Regulation 18 Scoping consultation and a Schedule of Representations was prepared which summarised the responses received and sets out the Council's response. This report can be viewed at Appendix C.

Appendix A: List of Specific and General Consultation Bodies

Specific / Statutory Consultees	
Homes England	National Grid Land & Development
Lancashire County Council	Coal Authority
Fylde Borough Council	Environment Agency
Wyre Borough Council	Historic England
Preston City Council	Natural England
St Anne's Parish Council	Highways England
Westby with Plumpton's Parish Council	Network Rail
Staining Parish Council	
NHS England	Marine Management Organisation
British Gas Properties	Orange
Electricity North West	O2
United Utilities	BT Group Plc, Regional Manager North West
Hutchinson 3G UK Limited (Three)	Mono Consultants Limited
Mobile Operators Association	T-Mobile
Patrick Farfan Associates	Vodafone

General / Non-Statutory Consultees	
Elected Representatives	Youth Groups, Schools, Colleges
Blackpool North MP	Blackpool Young People's Council & Blackpool Voice
Blackpool South MP	Blackpool & Fylde College
European MPs	Blackpool Sixth Form College
Blackpool Councillors	Blackpool Scouts Service Team
Bodies representing Disabled People	Revoe Community Primary School
Fylde & Wyre Society for the Blind	
Motor Nuerone Equalities Forum	Local Businesses / Business Groups
Leonard Cheshire North West Region	Business Link Lancashire
Princess Alexandra Home for the Blind	Federation of Small Businesses
Blackpool Society for Mentally Handicapped	Lancashire Economic Partnership
Blackpool Fylde & Wyre Mind	Blackpool Self-Catering Association
Deaf Society	StayBlackpool
Fibromyalgia Support Group	Lancashire and Blackpool Tourist Board
RNIB	Blackpool Fylde & Wyre Trades Union Council
	North & Western Lancashire Chamber of Commerce
Voluntary Bodies	The Mersey Partnership
Council for Voluntary Service	CL Edwards & Sons Ltd
Barnardos Blackpool Project	Blackpool Licensed Taxi Operators Assoc.
Blackpool SURF	Campaign for Real Ale (CAMRA)
Community Futures	Lancashire Fire & Rescue Service HQ
Blackpool Friends of Kingscote Park	Tesco
Blackpool & Fylde Rail Users' Association	Blackpool BID

Appendix B: Copy of consultation notification

Date: 12th June 2017

XXXX
XXXX
XXXX
XXXX
XXXX

Our Ref: LPP2-Reg18
Direct Line: 01253 476009
Email: planning.strategy@blackpool.gov.uk

Dear Sir / Madam

**BLACKPOOL LOCAL PLAN
PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES
REGULATION 18 SCOPING CONSULTATION**



Blackpool Local Plan Part 2: Site Allocations and Development Management Policies – Regulation 18 Scoping Document

The Local Plan Part 2 will:

- Allocate sites for new development including housing, employment and retail and identify areas for safeguarding and protection e.g. public open space, greenbelt
- Designate areas where particular policies will apply e.g. local centres
- Include policies to be applied when considering applications for development e.g. design, amenity and transport



Have your say!
Public Consultation takes place between Monday 12th June and 5pm Monday 24th July 2017

For further info: www.blackpool.gov.uk/localplanpart2

Blackpool Council is currently consulting on the **Local Plan Part 2: Site Allocations and Development Management Policies – Regulation 18 Scoping Document**. This is the first consultation stage of the Local Plan Part 2 preparation process. The Council is seeking views on what policies the document ought to contain as we want to ensure we have the right planning policies for Blackpool.

Consultation continues until 5pm Monday 24th July 2017

All documents relating to this consultation and how to respond can be found on the council website:

www.blackpool.gov.uk/localplanpart2

They are also available to view during normal opening hours at:

- Customer First Centre, Municipal Buildings, Corporation Street
- All libraries across the Borough

The Council is also undertaking a ‘**Call for Sites**’ and asking local residents, businesses, landowners and developers to identify potential sites for development, or protection from development, in Blackpool. Further information can be found at www.blackpool.gov.uk/callforsites

This is your opportunity to comment on the policies and proposals for Blackpool. We are keen to hear your views. If you have any queries, please do not hesitate to contact us.

Yours faithfully

Ms Jane Saleh
Head of Planning Strategy

Appendix C: Schedule of Representations

Blackpool Local Plan Part 2: Site Allocations and Development Management Policies - Regulation 18 Scoping Document

Consultation June-July 2017

Schedule of Representations

Blackpool Council



Ref.	Name/ Company	Comment	Council Response
001	Lancashire Archaeological Advisory Service	No comment	-
002	Historic England	<p>Expects the Local Plan to include a proper description, identification and assessment of the Historic Environment</p> <p>The Plan needs to demonstrate how it conserves and enhances the historic environment of the area.</p> <p>A sound up to date evidence base on the historic environment</p> <p>The Local Plan should include specific policies for the historic environment in order to help inform decisions that affect it. Key issues that need to be considered are:</p> <ul style="list-style-type: none"> • Undesignated heritage assets • Designated heritage assets • Archaeology • Conservation areas • Registered parks and gardens • Heritage at risk • Important views and vistas • Landscape character • Individual settlements • Historic shopfronts and advertisements • Public realm • Design • Information to accompany an application <p>Consideration needs to be given to strategic cross boundary</p>	The Council will fully consider the Historic Environment throughout the development of policies in the Local Plan Part 2.

		<p>issues that affect the historic environment.</p> <p>Before allocating any site, there needs to be an evaluation of the impact the proposal might have on a heritage asset and its setting through a heritage impact assessment.</p>	
003	A Webster	<p>Supports the need to bring back international flights to Blackpool Airport including a new train or tram link. The airport has been impacted by new housing developments.</p> <p>Concerned about the scale and size of housing around Marton Moss suggesting here are too many being built and some of the housing are for the rich only 6 bedroom mansions.</p> <p>There is a need to demolish old hotels and replace them with new, but do not turn them into apartments this would impact on Blackpool's tourism.</p>	<p>Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.</p> <p>The Council acknowledges and recognises in the Core Strategy a neighbourhood planning approach would allow the community to shape policies which may allow some new housing development.</p> <p>The issue of Blackpool's Visitor Accommodation offer is set out in the Core Strategy Evidence Base Document – Fylde Coast Visitor Accommodation Study (2008) and is covered by Core Strategy policies CS21: Leisure and Business Tourism and CS23: Managing Holiday Bedspaces.</p>
004	J Mcculloch	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
005	V Oshea	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
006	L Goupil	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
007	P Robinson	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.

008	T Aitkenhead	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
009	M Farrar	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
010	K Walker	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
011	A Harbottle	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
012	J Hamilton	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
013	N Harman	Supports the need to bring back international passenger flights to Blackpool Airport and extend the trams into the airport as well as Blackpool North station. Raises concern with the homeless and drug problem in the town. Abandoned duvets across the town Concerned about the large amount of shops shutting down.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2. These issues are currently being tackled by the Council's Enforcement Teams.
014	P Jenkinson	Supports the retention of Blackpool Airport. Ensure it is self-sustainable to attract a wider audience.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.

015	Wyre Borough Council	<p>The Local Plan Part 2 provides further detail to the strategic policies set out in the Council’s Local Plan Part 1: Core Strategy. Wyre accepts that the Blackpool Core Strategy was found sound, and that the Strategy set out within the document was found to be a sustainable strategy. However, these conclusions were drawn on the basis of the information available at the time which did not indicate an un-met housing need arising in a neighbouring authority within the same HMA. The Duty to Cooperate Statement submitted to that examination was drafted at a time when it was thought that all the Fylde Coast authorities could meet their own OAN. Indeed the Inspector’s Report into the Blackpool Core Strategy noted:</p> <p><i>8. In the light of the February 2014 SHMA, which sets out a range for the objectively-assessed need for new housing in Fylde, Wyre and Blackpool, each authority has indicated through discussions that it considers that it is likely to be able to accommodate its need within its own boundaries. Concern has been raised that the housing requirement for Blackpool set out in the plan and those indicated in the Preferred Options reports for Fylde (2013) and Wyre (2012) are, together, less than the lowest indicated figure in the SHMA for housing need across the Fylde Coast. However, the Fylde and Wyre Preferred Option reports pre-date the February 2014 SHMA and Blackpool Council has stated that the neighbouring authorities have indicated that the housing requirement in their emerging Local Plans will reflect the SHMA. Consequently, notwithstanding the Preferred Options housing figures set out some years ago, there is no reason to believe that the objectively assessed need for housing across the Fylde Coast will not be provided for.</i></p> <p><i>9. Nonetheless, given the importance of meeting housing needs across the Fylde Coast housing market area it is necessary for the plan’s effectiveness for it to be clear that the Council will</i></p>	<p>In November 2017 Blackpool Council formally responded to the consultation on the Publication Draft Wyre Local Plan. The submitted representation sets out Blackpool Council’s position regarding the Wyre Local plan, supporting information, evidence base and the Duty to Cooperate.</p> <p>As noted in the representation, there is a commitment in the Blackpool Core Strategy to work with Wyre (and Fylde) to ensure that the housing needs of the housing market are met. However, this does not negate the significant concerns that Blackpool Council has about the approach proposed to calculating housing need and addressing this need as set out in the Publication Draft Wyre Local Plan and supporting documents.</p> <p>The Wyre Local Plan has now been submitted and the issue of housing need in Wyre will be addressed as part of the Examination process.</p> <p>The Duty to Cooperate process is ongoing and further engagement will take place with Wyre Council, Fylde Council and other relevant bodies as the Blackpool Local Plan Part 2 progresses.</p>
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continue to work with neighbouring authorities to ensure that the overall housing needs of the housing market area are met. Modification MM04 is thus necessary to soundness, although this in no way undermines the extent or effectiveness of the Council's co-operation with others in preparing the plan.

Main modification 04 was an addition of a paragraph to the supporting text of policy CP2. The added paragraph is at 5.23 which states:

“The SHMA identifies an Objectively Assessed Need for each of the Fylde Coast authorities within the housing market area. The Council will continue to work with the neighbouring authorities of Fylde and Wyre through the Duty to Cooperate to ensure the overall housing needs of the housing market area are met in full”.

This modification was proposed following representations to the publication version of the Plan which outlined concerns over the flexibility of the Plan to adapt were a shortfall in housing to arise within the housing market area. It is possible that the Inspector's conclusions on housing need drawn from an EIP in May 2015 may be very different with the new information available today.

The proposed list of policies and indeed the entire Regulation 18 Scoping Document makes no reference to the unmet housing need arising in the neighbouring authority of Wyre. The Sustainability Appraisal Scoping Report notes that “The sub-region demonstrates a high level of self-containment in terms of housing markets, travel to work patterns and economic functionality; and the Fylde Coast authorities have been working together on strategic planning issues for many years. It has been important to address cross-boundary issues in a collaborative

way, to ensure Blackpool's Local Plan Part 2 aligns with the policy framework of neighbouring authorities, and co-operate with them on strategic planning issues".

Wyre Council is surprised that the Regulation 18 document itself does not reference the issue of unmet housing need arising from Wyre and considers that this is a serious omission in the scoping of the document. As noted in the SA it is vital that Blackpool's LP Part 2 aligns with the policy framework of neighbouring authorities.

Wyre has been raising the issue of potential unmet housing need with Blackpool (and other neighbouring authorities) informally since May 2015. From mid-2015 Wyre was raising the issue of likely un-met housing need at the Fylde coast Duty to Cooperate meetings. In late 2015 and early 2016 representatives from Blackpool Council attended meetings in Wyre with Lancashire County Council and Highways England to discuss the emerging highways evidence for the Local Plan which was showing the severe highways constraints the Borough faces. Draft versions of the emerging highways evidence were also shared with Blackpool throughout production. Subsequently a formal written request for assistance was raised with the Council in May 2016. A series of letters were exchanged in late 2016 between the two authorities discussing the matter.

Wyre considers that the Local Plan Part 2 should consider this matter and respond to the shortfall accordingly. As part of preparing the Local Plan Part 2, Blackpool will need to examine available and deliverable land to meet development needs. It should therefore consider as part of the process how it can assist in meeting the shortfall in Wyre through allocating additional land for development.

016	H Salt	Supports the need to bring back international passenger flights to Blackpool Airport.	Support noted. This is a wider corporate issue and cannot be influenced by the Local Plan Part 2.
017	Theatres Trust	<p>Supports the inclusion of a policy to promote and protect community and cultural facilities.</p> <p>Culture and the creative industries play a key role in developing vibrant town centres which are at the economic and social heart of sustainable communities. Cultural and community facilities support the day to day needs of local communities and help promote well-being and improve quality of life. It helps develop a sense of place and that makes communities unique and special. There is also a growing awareness of the role that the arts and culture play in attracting and retaining residents and developing a skilled workforce.</p> <p>Local plans should therefore support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration in town centres.</p> <p>The Theatres Trust recommends inclusion of a policy with wording along the lines of:</p>	Support noted. The council will consider the draft wording when developing a community facilities policy.

Cultural and Community Facilities

Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres.

- Major developments are required to incorporate opportunities for cultural activity, including through the interpretation of the heritage of the site and area.
- The loss or change of use of existing cultural and community facilities will be resisted unless:
 - replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision;
or
 - it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.
- The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations and the public realm.
- Council will apply the 'agent of change' principle, whereby if a

		<p>development would potentially result in conflict between a cultural activity and another use, especially in terms of noise, then the development responsible for the change must secure the implementation of appropriate mitigation.</p> <p>For clarity, and so that guidelines are clear and consistent, the accompanying text and the Glossary should contain an explanation for the term ‘cultural and community facilities’. We recommend this succinct all-inclusive description which would obviate the need to provide examples: <i>cultural and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p>	
018	Education and Skills Funding Agency	<p>The ESFA welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>General Comments on the Local Plan Part 2 Approach to New Schools</p> <p>The ESFA notes that some growth in housing stock is expected in the borough over the plan period which will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be ‘positively prepared’ to meet the objectively assessed development and infrastructure requirements.</p> <p>You will have no doubt taken account of key national policies relating to the provision of new school places, bearing in mind the requirement for Local Plans to be consistent with national policy, but it would be helpful if the NPPF was explicitly referenced within the document. In particular:</p>	<p>Comments noted.</p> <p>The Core Strategy in Policy CS15 ‘Health and Education’ supports development that will enable the provision of high quality new and improved education facilities, including the re-modelling, extension or rebuilding of schools in Blackpool.</p> <p>The allocation of additional school sites will be considered during the development of the Local Plan Part 2.</p>

- The (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).

The ESFA supports the principle of Blackpool safeguarding land for the provision of new schools to meet government planning policy objectives.. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

Blackpool should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.

The ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. In line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.

Ensuring there is an adequate supply of sites for schools is essential and will ensure that Blackpool can swiftly and flexibly respond to the existing and future need for school

places to meet the needs of the borough over the plan period.

Site Allocations

The ESFA supports the redevelopment of the former Arnold School site at Lytham Road following capital approval for the New Armfield Academy. The ESFA would welcome continued support within the Local Plan to safeguard this site for continued D1 (education) uses and that due consideration be given to the removal of the existing local listings to enable comprehensive redevelopment of the site for public benefit.

The ESFA welcomes the list of proposed Development Management policy areas (para 4.1) that should be included within the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Document. We would request that a policy be included within the Community Facilities section to highlight the need to ensure that sufficient land is allocated to allow for the development of new schools and the expansion of existing schools, where necessary.

The Core Strategy proposes housing growth of 4,500 dwellings over the plan period 2012-2027. The Local Plan Part 2 must therefore ensure that sufficient land is allocated for school uses to meet the needs of this housing growth, and robust forecasts must be used to identify the medium to long-term capacity requirements. The ESFA suggest that such forecasts be included within the published evidence base documents to support subsequent stages of the Local Plan.

Developer Contributions and CIL

One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In

		<p>this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Blackpool does not currently have any plans to introduce a CIL tariff, however, we would be keen to contribute to any wider review of developer contributions that may take place in the future. As such, please add the ESFA to the database for future CIL consultations.</p>	
019	JWT Leisure	<p>Highlights that limited forms of ‘amusement centres’ catering for adults provides a service appreciate and used by Blackpool shoppers. This use is different to the resort style amusement arcades.</p> <p>Want to ensure that any amusement arcade policy does not purport to cover amusement centre use and then either have a different policy like the existing BH18 or allow the consideration of applications for amusement centre use on their own merits.</p> <p>If the Council are to replace the current policy BH18 Amusement Centre, consideration should be given to widen the parts of the Town Centre that this use is allowed as the current are too remote and lacking in pedestrian activity to effectively function.</p>	<p>The Council accepts that an Amusement Centre use is materially different to the Amusement Arcades that are typically found on the Golden Mile, for example.</p> <p>The Council will consider the need for a specific policy relating to Amusement Centre uses.</p>
020	Lancashire County Council	<p>We are in broad agreement with the proposals presented within the Regulation 18 Scoping Document.</p> <p>The updated draft School Place Provision Strategy 17/18 to 19/20 consultation has recently closed. The document sets out how we intend to review the educational provision in Lancashire to ensure the right number of school places are in the right</p>	<p>Comments noted.</p>

areas, at the right time to meet demand. Approval will be sought over the next couple of months and will be available on the Lancashire County Council Website when approved.

The Strategy for the provision of school places and school's capital investment 2015/16 to 2017/18 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

In a letter from the DfE to all Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that 'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement'. The School Planning Team at Lancashire County Council produces an Education Contribution Methodology document which outlines the methodology for assessing the likely impact of new housing developments on schoolplaces, where necessary mitigating the impact, by securing education contributions from developers.

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Council's Home to School Transport Policy.

Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed
- Projected to become over-subscribed within 5 years; or
- A development results in demand for a school site to be provided

Comments on the Regulation 18 Scoping Document

The policy documents available on Blackpool Council's website included the Core Strategy, adopted 2016, the Infrastructure Delivery Plan 2014 and Core Strategy Policy Maps 2016. After reviewing these documents, and at this early stage of the local plan process, the information available requires further monitoring to understand the impact of strategic housing to be delivered within Blackpool and potentially into neighbouring districts and the impact across the education provision.

The close boundary relationship of Blackpool with the districts of Wyre, and in particular Fylde has the potential to impact on the inward, and outward migration of mainstream school pupils across the districts. Monitoring allows us to understand the impact in mainstream education across the two districts understanding the travel of pupils and the

Comments noted. We will consider the impacts of new housing sites on education provision as part of the development of the Local Plan Part 2. The IDP will be updated as part of the process.

		<p>preference of parents of one school over another.</p> <p>The strategic housing development at Whyndyke Farm is one development that cuts across the two districts working in partnership, and references are made regarding this development in the supporting documents. Currently discussions are ongoing with Fylde Council regarding the education provision to meet the demand of this development, including a proportion within the Blackpool boundary.</p> <p>The Infrastructure Delivery Plan (IDP) 2014 is an important part of the local plan, and sets out the infrastructure required to support housing growth. We request that Lancashire County Council School Planning Team are included in any consultations or updates to the IDP, ensuring we are able to make comment on any changes with the potential to impact on the education provision within schools managed by Lancashire County Council.</p>	
021	Natural England	<p>Overall as the plan progresses the Development Policies should take a strategic approach to the conservation, enhancement and restoration of the natural environment, and promote opportunities for the green infrastructure and recreational access as part of any development.</p> <p>Blackpool LPA needs ensure the plan considers the implications of the plan beyond the LPA boundary.</p> <p>Natural England would like to see more information within the environment section on how the natural assets will to be protected, conserved and enhanced and that this should be a key issue in the document as it evolves. Natural England would expect biodiversity and geodiversity, soils, priority habitats,</p>	Comments noted.

ecological networks, protected species to be covered under the heading of the natural environment.

Net Gain

Natural England encourages net gain. Net gain for biodiversity and for nature is enshrined within NPPF paragraphs 9, 109 and 152. It can be secured on an individual project basis but is best delivered spatially by embedding it into local plans (using a sound evidence base).

Net gain projects should protect or buffer core sites, enhance connectivity or provide ecological stepping stones for species e.g. form part of local Green Infrastructure (GI) strategies.

Net gain is achieved by auditing the existing biodiversity that a development will impact, establishing a numeric value for that biodiversity (ideally using the Defra metric) and then calculating how much additional biodiversity is needed to secure a net gain legacy.

Ecological advice should always be sought when calculating net gain.

Protected species

Protected species is referred to in the scoping document. Further

Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Recreational Pressure

It is recommended the LPA provide more detail as the plan emerges on how potential recreational pressure related issues will be addressed. This is connected with disturbance to

foreshore bird populations connected with the Ribble and Alt Estuaries Special Protection Area and Ramsar site and Ribble Estuary Site of Special Scientific Interest. Natural England is interested in how development in Blackpool increases users of beaches and how impacts (alone or in-combination) will be avoided or mitigated.

Natural England recommends including policies specifically regarding the provision of green/open space to be provided on site so it is close to where people live (as that's where most people will engage with the natural environment) but this also needs to sit as part of a wider network to enable people to fully uptake sustainable transport options and improve health through being more active. It is also recommended there is strong join up with neighbouring LPA's in terms of wider access provision.

Transport

Under the transport section there is an opportunity to include a clear reference to the importance of green infrastructure here would set it alongside transport and other infrastructure explicitly and help stress the point that planning for green infrastructure is important to support new housing and growth development as is transport infrastructure.

Infrastructure

It is recommended an infrastructure section is included with Sustainable Urban Drainage Systems (SUDS) to minimise flood risk that is a possible infrastructure issue, which could be included. Besides the use of SUDs, natural solutions to manage water within the built environment could also be acknowledged and/or included in the plan. The aim should be to encourage all developments to prioritise this approach because of the multiple benefits it can provide.

Marton Moss

In terms of the Marton Moss and engaging with the community over a possible Neighbourhood Plan (NP), Natural England would require clarification as to what will happen if the local community do not want to progress a NP. It would also be useful for the Local Plan to set some principles on what needs to be achieved in this area to inform the NP process.

Impact Risk Zones

Including Impact Risk Zones (IRZs) on the policy map would help when assessing impacts/risk with regards to development and designated sites. Catchment areas for watery designated sites will also help with assessing risks and opportunities.

The Impact Risk Zones (IRZs) are a GIS tool which can help to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which the site is notified and indicate the types of development which could potentially have adverse impacts. Information about using the data can be found here. This tool is likely to be beneficial in early plan making and we recommend its use to identify impacts that require further consideration when assessing potential development sites for inclusion within the plan. Natural England is happy to provide further advice and support on the IRZs and can offer more detailed data sets on protected sites if required.

Sustainability Appraisal Scoping

Natural England welcomes the amendments that have taken place since the last version, particularly around objective 12: To protect, maintain and enhance green infrastructure,

biodiversity and geodiversity, although it would be helpful to add more detail to the sub objectives specifically stating what is to be achieved from this objective.

Monitoring and Indicators

As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the DPD. This should include indicators for monitoring the effects of the SADPD on biodiversity (NPPF para 117).

Whilst it is not Natural England’s role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Landscape:

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

022	S Richmond	Supports the development of infill plots on Marton Moss in order to enhance the appearance of the area.	Support noted.
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023	Sport England	<p>Welcomes the aim to provide policies in relation to Open land meeting community and recreational needs and community facilities.</p> <p>It would be useful to consider also including a site specific policy on key sports hubs and key playing field sites to deal with expansion/changes as well as seeking to allocate new playing field sites in line with the findings of the council's 2016 playing pitch strategy. It would be useful to also consider how you deal with lapsed and disused sites and any shortfalls identified in the strategy which will mean you need allocate sites for new playing fields/ sports facilities.</p> <p>Marlon Moss CS26 - we note the general approach to further investigate where residential development may be acceptable but wish to remind the council this area contains two established sports clubs, South Shore Tennis Club and Squires Gate Football Club both with a range of facilities. Any plans to redevelop their sites should be done in compliance with para74 of the NPPF and we remind the council Sport England would be a statutory consultee on any subsequent application.</p> <p>Section 5 - The Council's recent 2016 playing pitch strategy should be listed under the evidence base. This is a key document setting out current and future needs for sport and has the buy in of all the pitch sports governing bodies. This will supersede the cited open space study on outdoor sports.</p> <p>Has the council done similar work on assessing the needs for indoor sports facilities? This again is a key part of the evidence base and should be used to help inform any site specific issues.</p>	<p>Comments noted. The Council will undertake as assessment of the Indoor Sports Facilities in due course.</p>
024	K Rooney	<p>I wish to comment on Marlon Moss (paragraph 4.2) and feel that the current policy is too restrictive, particularly regarding development on infill sites.</p>	<p>The Core Strategy Policy CS26 was found sound by the Planning Inspector at Examination.</p>

Communities Secretary, Sajid Javid recently said that the Government was determined to build homes 'in places where people wanted to live' in spite of local opposition to many new developments (July 2017). Therefore, adopting a blanket approach to planning decisions on Marton Moss seems too restrictive and should not be applied to potential infill sites in residential areas, which have lain fallow for many years, particularly when there are adjacent properties which would benefit from a well-planned development. There are very few small holdings on Marton Moss and hardly any households rely on agriculture for a living. This has been the case for several decades, so it seems unrealistic to limit development for agricultural or horticultural purposes only and reject applications which could benefit the local community.

Further clarification is needed as to what is meant by the distinctive character of Marton Moss. Parts of Marton Moss are semi-rural in nature with attractive housing mingling in with the surrounding landscape. However, some land lays fallow, has not been used for agricultural purposes for decades and could be an easy target for vandals or fly tipping. To enhance the distinctive character, would it not be better to develop the fallow land, particularly in residential areas? Integrating well designed houses with existing properties would enhance the appearance of the environment and make neighbouring property owners feel more secure. Maintaining the status quo with the existing policies, is a deterrent to such developments and will only sustain an environment with derelict and potentially contaminated land which does not support section 16 of the Scoping Report which proposes to reduce this type of land. Furthermore, the Planning Practice Guide states that in order to promote healthy communities there should be "safe and

Further work is being undertaken to develop a Neighbourhood Planning Approach for the area.

accessible environments where crime, disorder, and fear of crime, do not undermine the quality of life or community cohesion.”

There are already existing discrepancies regarding only allowing development for agricultural or horticultural use on Marton Moss. In 2014 the Council approved an application for a caravan site which included permission for static caravans, touring caravans and tents. Also in 2014, permission was granted for a car sales room on Marton Moss and there have been other instances when permission has been granted for dwellings or buildings which do not appear to have any relevance to agriculture or horticulture. Also, large parts of Marton Moss have been developed so it seems illogical that permission is not granted to infill sites in residential areas. This suggests that the council should not adopt such a restrictive approach to planning applications on Marton Moss, particularly in residential areas where there are current dwellings with access to the local amenities. This ‘blanket approach’ to planning applications on Marton Moss seems to contradict the recommendation in The Planning Practice Guide regarding Rural Housing paragraph 001 which states “blanket policies restricting housing developments in some settlements from expanding should be avoided unless their use can be supported by robust evidence.”

If a planning application is lodged which will enhance the environment and have a positive impact on the quality of life of the neighbouring properties, it should be reviewed for its merits, rather than be rejected due to a blanket ‘one size fits all’ policy. Paragraph 197 of the Planning Practice Guide states: “Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work pro-actively

		<p>with applicants to secure developments that improve the economic, social and environmental conditions of the area.”</p> <p>The current policy regarding Marton Moss needs reviewing and should be more receptive to infill developments which will not detract from the environment or surrounding properties. If the Marton Moss community prepares a Neighbourhood Plan, the community should keep an open mind and adopt a more positive approach to infill sites, in order to address the requirements for new developments in South Blackpool and allow developments which will enhance the area, before rejecting planning applications based on restrictive policies.</p>	
025	K Beardmore	<p>The New Housing Development policy topic is somewhat vague and limited. The policy should provide specific allocations in accordance with the call for sites exercise in order to meet the housing requirement. The LPA also need to demonstrate how they will address a lack of performance in respect of their annual housing requirement over the plan period. Consideration should be given as to whether the housing requirement in the Core Strategy constitutes an objectively assessed housing need.</p> <p>The Council must also be able to discharge their Duty to Co-Operate, forming, as they do, part of the wider Fylde Coast Housing Market Area. This point is also made by the HBF in their submissions and we would agree with this comment.</p> <p>The Scoping Document in Section 3 refers to the Call for Sites Exercise. It may be that those countryside boundaries need to be reviewed as part of the Call for Sites exercise.</p>	<p>Comments notes.</p> <p>This Scoping Document sets out the ‘scope’ of the Local Plan Part 2 and did not intend to provide a lot of detail.</p> <p>The Draft Plan will provided the fully draft policies and proposed site allocations.</p> <p>The housing requirement set out in the Core Strategy was found sound by the Planning Inspector at Examination.</p> <p>The Duty to Cooperate process is ongoing and further engagement will take place with neighbouring authorities and other bodies as the Blackpool Local Plan Part 2 progresses.</p>
026	Gladman Developments	<p><u>National Planning Policy</u></p> <p>The National Planning Policy Framework (the Framework) sets out four tests that Local Plans must meet in order to found sound at examination. In this regard, we submit that in order to</p>	<p>Comments noted.</p> <p>As the Local Plan Part 2 moves forward the Council will provide clarity on any policies that are no longer to be</p>

prepare a sound plan it is fundamental that the Plan is:

- Positively prepared The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence base.
- Effective the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- Consistent with National Policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Whilst recognising that this consultation is one of the first stages in plan preparation, the Council will need to consider whether the saved Local Plan policies are consistent with the requirements of the Framework. The saved Local Plan policies were prepared in accordance with a previous era in national policy and as such may need to be revisited to ensure consistency with the Framework. Going forward, the Council will need to provide clarity on which policies will no longer be progressed and which policies will be replaced through the LPP2.

New Housing Development

Although the information is limited, this policy topic identifies the possibility of introducing requirements for new housing development such as including floor space standards. It is important that any policies introduced through the LPP2 are supported by proportionate and robust evidence to justify their

progressed and set out where new policies replace saved policies.

Consideration is being given to the incorporation of the optional nationally described space standards in a policy in Part 2 of the Local Plan. The inclusion of the standards will be subject to viability considerations and based on evidence.

Further clarity on housing provision for older people will be provided in the proposed policy and supporting text.

Further clarity on the approach to custom/self-build will be provided in the proposed policy and its supporting text.

The Duty to Co-operate process is ongoing and engagement will take place with neighbouring authorities and other relevant bodies throughout the Blackpool Local Plan Part 2 preparation process.

Sustainability appraisal will be undertaken during the preparation of the Local Plan Part 2 to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

inclusion within the Plan.

Furthermore, it is important that any policies relating to the construction of homes fully accord to the requirements of paragraph 173 of the Framework and do not place unsubstantiated policy burdens that may threaten the deliverability of sustainable growth opportunities.

Housing for Older People

In principle, we support the Council in setting a criteria based approach for assessing proposals for housing with care and for older people. Importantly, any future policy must provide a supportive and flexible framework to complement existing housing stock whilst avoiding placing pressure on market housing supply.

Self-Build

Gladman would welcome the addition of a policy in relation to self-build housing within the LPP2. This would be in line with current government thinking and objectives and should be supported by robust evidence of need. It is key that the development industry are able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability. Gladman recommend that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council's policy requirements do not put the implementation of the Plan as a whole at risk.

Further to this, Gladman urge the Council to ensure the policy

has added flexibility as there is no guarantee that this form of housing will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise suitable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. This would provide flexibility and help to ensure that the required housing is delivered.

Legal Requirements

Duty to Cooperate

The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2003, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination, the 2013 Mid Sussex Core Strategy Examination and the recent St Albans Local Plan Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

Gladman recognise that the DtC is a process of ongoing engagement and collaboration as set out in the PPG it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic

issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation to ensure that DtC the Council should effectively engage with neighbouring authorities to meet any unmet housing needs in the HMA and vice versa. This is particularly important given that Blackpool forms part of the wider Fylde Coast Housing Market Area, and may need to assist neighbouring authorities in meeting unmet housing needs. The Council should ensure that it is able to demonstrate what steps have been taken at each stage of plan preparation to ensure that the plan has been subject to ongoing and effective cooperation with any interested parties to which a strategic cross boundary issue, such as unmet housing needs, may effect. This will require extensive and ongoing meaningful cooperation by both officers and members to ensure the Duty is met in full.

Sustainability Appraisal Scoping

The Sustainability Appraisal (SA) scoping report represents the first phase of undertaking the SA. Whilst at this stage Gladman have only minor comments in relation to the SA process, we look forward to reviewing the outcome of the Under Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to SA. Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA Local

The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable

d and transparent.

Gladman remind the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in plans failing the test of legal compliance at Examination or being subjected to legal challenge. There are also numerous examples where deficiencies with SAs have led to timely suspensions of EiPs whilst Councils ensure that the SA regulations have been adequately met.

Gladman would like to take the opportunity to remind the Council how a justified and adequate SA should be undertaken to inform the policies and allocations made through the Local Plan. This should not be a cursory exercise, but should be a fundamental part of the plan preparation process and should help to inform the decisions made by the Council. In light of experiences in other authorities, the Council need to ensure that the policy choices in the LPP2 are clearly justified by the results of the SA process. Specifically, it should be clear from the SA process why some policy options have been progressed and others rejected.

In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, the Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choice. It is integral that each rejected after a fair and comparable assessment of its sustainability credentials.

The Council should not seek to progress a pre-determined strategy that unjustifiably influences the assessment process. The SA needs to be undertaken in a clear and transparent manner.

027	United Utilities	<p>United Utilities seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations.</p> <p>New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.</p> <p>Site Allocations - It is acknowledged that alongside the consultation on the SADMPD, the Council are also running a Call for Sites exercise. We understand Officers will be required to consider the allocation of a large number of potential development sites as part of the emerging SADMPD. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on wastewater infrastructure can only be achieved once more details are known, such as timescales for development, the approach to surface water management and the chosen points of connection. On receipt of more information it may be that we can provide more detailed comments regarding the sites which are being promoted as draft allocations. The assessment of impact on our infrastructure is an ongoing process as a range of details become available.</p> <p>Additional information in respect of development sites is often only available at the planning application stage. With this information we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of new development with the timing for the delivery of future</p>	<p>Comments noted. Consideration will be given to including a specific surface water policy and local infrastructure policy as part of the development of the Local Plan Part 2.</p>
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infrastructure improvements.

SPECIFIC COMMENTS

Surface Water Drainage

Whilst it is recognised that Policy CS9 of the adopted Core Strategy (Water Management) does reference surface water drainage, United Utilities recommends that the Council includes an additional policy in the emerging Local Plan dedicated to surface water management.

We suggest the following draft policy is included:

“Surface water should be discharged in the following order of priority:

- 1. An adequate soakaway or some other form of infiltration system.*
- 2. An attenuated discharge to watercourse.*
- 3. An attenuated discharge to public surface water sewer.*
- 4. An attenuated discharge to public combined sewer.*

Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.

Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.

The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage systems for surface water.

On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of

how the approach to drainage on a phase of development has regard to interconnecting phases within a larger site.

Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development. On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.

On previously developed land, applicants should target a reduction of surface water discharge in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. In demonstrating a reduction, applicants should include clear evidence of existing positive connections from the site with associated calculations on rates of discharge.

Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces. In seeking to most appropriately manage the impact of surface water run-off, developers will be expected to include permeable materials. These measures are particularly important in a town like Blackpool which has an unusual drainage system where many surface water sewers and watercourses connect with the combined sewerage system, either directly or indirectly. The treatment and processing of surface water is not a sustainable solution.

Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network.

A discharge to groundwater or watercourse may require the consent of the Environment Agency.”

New development should manage surface water run-off in a sustainable and appropriate way. This approach is in accordance with paragraph 103 of the NPPF.

Infrastructure Provision

Whilst it is acknowledged that infrastructure provision is referenced within adopted Core Strategy Policy CS11 (Planning Obligations), we consider the SADMPD should include a specific policy in relation to local infrastructure provision.

As detailed above, in some instances it may be necessary to coordinate infrastructure improvements with the delivery of development. In accordance with paragraphs 156 and 162 of the National Planning Policy Framework (NPPF), we recommend the following detailed policy is included as part of the emerging Local Plan in relation to infrastructure provision:

“Once more details are known on development sites, for example the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.”

With respect to larger development sites, which can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries, we recommend the following:

“At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure co-ordination between phases of development over lengthy time periods and by numerous developers.

The Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough.”

With regards to large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.

We encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy.

On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability.

Whilst we appreciate the Council has yet to identify any potential development sites as part of the Local Plan process, we strongly recommend this is addressed in advance of

allocating specific sites.

Water Efficiency

We note that Policy CS9 (Water Management) ensures that new development incorporates water efficiency measures. United Utilities wishes to highlight the importance of incorporating water efficiency measures as part of the design

process for all new development. There are various methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example.

Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. Water efficiency measures contribute to the delivery of sustainable development.

Health and Well-Being

In respect of health, well-being and maximising the quality of residential amenity, United Utilities wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of pollution (e.g. noise and odour)

In the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which can be considered a 'bad neighbour'.

028	Councillor P Galley	<p>Looking at the environmental policies they only seem to make reference to new developments providing new or improved open space.</p> <p>Improving the environment of the Borough, particularly the Town Centre and inner areas through creating “open space” is impossible as there is very limited room to develop. Maybe we should be concentrating more on making new development create more greenspace, rather than open space. Rather than trying to create new open spaces where there is no room to, we could look at encouraging innovative design like roof gardens, or something like the living wall at Manchester Deansgate. Simply having greenspace to look at rather functional greenspace has been known to have massive mental health benefits for the resident population. They will also help to create a sense of pride in the buildings from the residents, and as a “sense of civic pride” is one of the points in the Spatial Vision for Blackpool in the adopted Core Strategy then this will tie in.</p> <p>Also, looking at SPG11 open space in new developments, I have to question why it is only new development that warrants contributions for open space improvements? As a significant amount of the development in central Blackpool comes through the conversion and sub division of old buildings (Blackpool Council Housing Monitoring Report 2016), then can we have a policy that states that they have to provide some kind of innovative green design or for financial contributions to help the Council provide these? They are the biggest source of residential development in the Town Centre so they should have to contribute more.</p>	<p>It has been proven unviable in the Inner Area to request contributions for Affordable Housing and there any other contributions would impact on the deliverability of any schemes in the inner area.</p>
029	Home Builders Federation	<p>The range of policies generally appears appropriate. The Council will need to provide clarity where new policies within Part 2 of the Local Plan replace other saved policies.</p>	<p>Comments noted.</p> <p>The Council will provide clarity where new policies</p>

New Housing Development

The further information upon this policy indicates that it will identify; "...requirements for new housing development including floorspace standards". It is important that the policy provides a supportive framework for housing development and does not seek to place additional burdens and barriers to delivery within Blackpool. This is particularly important due to the under-delivery

which has occurred over the early years of the Local Plan, albeit it is acknowledged there are encouraging signs of increased delivery since 2014/15.

The Council will also be aware of the 'housing delivery test' suggested in the Government's recent Housing White Paper. This will require action to be taken if delivery falls below 95% of the Council's annual housing requirement over a rolling 3 year period. The Council will need to consider the implications of this delivery test and identify appropriate actions and trigger points.

The further information section refers to 'floorspace standards', it is unclear whether or not this relates to the optional nationally described space standards (NDSS). To implement the NDSS the Council will need to comply with the evidence requirements set out within the national Planning Practice Guidance (PPG), particularly ID 56-020. The PPG is clear that the NDSS are to be imposed on a 'need to have' basis rather than 'nice to have'. The evidence required by the PPG does not appear to be included in the evidence base list at paragraph 5.2 of the consultation document. The Council will also need to consider the recent commentary within the Government's Housing White Paper which confirms its intention to review the NDSS. The White Paper stated (paragraph 1.55);

within Part 2 of the Local Plan replace other saved policies.

Consideration is being given to the incorporation of the optional nationally described space standards in a new housing development policy in Part 2 of the Local Plan. The inclusion of the standards will be subject to viability considerations and based on evidence.

The implications of the suggested housing delivery test will be taken account of as part of the approach to housing delivery in Part 2 of the Local Plan.

Further clarity on housing provision for older people will be provided in the proposed policy and supporting text.

Further clarity on the approach to custom/self-build will be provided in the proposed policy and its supporting text.

Further detail on design policy will be provided in the Local Plan Part 2. Additional policy or policies dealing with design will complement the approach taken in Core Strategy Policy CS7 'Quality of Design' which includes support for contemporary and innovative expressions of design, where appropriate.

Work is currently being undertaken to develop a Neighbourhood Planning Approach for Marton Moss and the Council is actively engaging with the local community to move the process forward.

“...the use of minimum space standards for new development is seen as an important tool in delivering quality family homes. However the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly desirable, many traditional mews houses could not be built under today’s standards. We also want to make sure the standards do not rule out new approaches to meeting demand, building on the high quality compact living model of developers such as Pocket Homes. The Government will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer...”

The Council should also consider the impacts that the introduction of the NDSS would have upon housing mix, viability and affordability. Given the current issues with viability and the significant need for affordable housing within Blackpool the HBF does not consider that the introduction of the NDSS would be justified. Further commentary will be provided upon this issue at later stages of consultation if the Council is to pursue the introduction of the NDSS.

Housing for older people

The HBF is supportive of the provision of housing for older people. It is, however, important that this compliments rather than burdens the mainstream market supply. It is therefore recommended that clarity is provided upon the range of products included which the Council consider would meet this need as well as providing a supportive framework for such provision rather than placing burdens on all housing sites.

Custom/ Self Build

The HBF is supportive of custom / self-build where it provides

genuine additionality to the supply. It is therefore recommended that any policy provides a supportive framework for the delivery of such dwellings without harming other sources of supply. The HBF would not support an arbitrary requirement for custom / self-build plots on all new housing developments due to the consequential impacts upon viability and potential to slow delivery.

Design

Good design is an essential component of any successful development. Design policies whilst providing a framework should not be unduly prescriptive as this will minimise the opportunities for innovative design and for developers to take account of site characteristics and viability considerations.

The HBF is a partner in Building for Life 12 (BfL12). This provides a useful reference for discussion upon design. Whilst developments can be scored against the BfL12 criteria a mandatory level of achievement would not be supported. The reason for this is that some developments may not be able to meet certain criteria simply due to their location or site characteristics.

Marton Moss

It is important that the development of this site is not held back pending decisions upon whether a neighbourhood plan is to be developed. The HBF therefore considers that the Council must actively engage and manage the timely production of a positively framed neighbourhood plan or develop its own policy if no such plan is forthcoming.

The scoping document identifies a number of evidence base

documents which are either to be updated or produced. The HBF agrees with this list. It is however likely, dependent upon the policies identified within the plan, that other evidence base documents may be required. Without specific detail of the policy content it is difficult to identify the extent of any further evidence base requirements.

The HBF would also anticipate to see an update upon how the Council has, and intends to continue, to discharged its requirements under the Duty to Co- operate. This is particularly important in terms of housing delivery where Blackpool forms part of the wider Fylde Coast Housing Market Area.

030

CPRE

Call for sites

The National Planning Policy Framework, 2012 (NPPF) does require local planning authorities to encourage developers to use brownfield land in advance of green fields. It states local plans can adopt a target to make policies more effective. CPRE recommends that Blackpool Council does adopt a target for brownfield reuse. Previously the North West Regional Spatial Strategy had a target of 65%, so we suggest this or higher, so that Blackpool can achieve its regeneration ambitions.

CPRE suggests that the data on sites previously recorded on the National Land Use Database (latest record showed just over 60 hectares, a third suitable for housing) is used in addition to the sites recorded on the pilot Brownfield Sites Register (which records just under 50 hectares, and 2,347 dwellings). CPRE is aware that the Brownfield Registers only relate to 'viable' sites, thus some brownfield may be 'hidden' off the database. We also

Comments noted.

seek transparency in terms of viability assessments where developers claim land is unviable.

Policy list

CPRE Broadly agrees with the list of policies. In addition, CPRE encourages specific policy for:

- *Green Belt land*

Where possible new areas of Green Belt should be created and designated land should be protected from inappropriate development. Specific reference to the purpose of Green Belt in keeping land permanently open is important to refer to. Green Belt land should not be easily sacrificed, *once it is gone, it is gone forever*;

- *Brownfield land*

A locally derived brownfield target should be adopted to effectively promote its reuse as a priority;

- *Landscape policy*

The retention of important elements such as dark skies, tranquillity, trees, and hedgerows should be specified, as well as good design to help preserve local distinctiveness in building styles and materials. Specific reference to cumulative harm should be included, specifically regarding wind development, and small extensions and changes to properties, which can cause

built intrusions into otherwise untouched rural landscapes.

- *Affordable Homes*

Rural settlements do need homes where supported by evidenced, but importantly it must be affordable, to enable balanced communities for the future.

- *Environmental Policy*

Environmental designations should be protected.

Marton Moss

CPRE agrees that Marton Moss is an important area that does need additional planning policy protection to ensure its continued protection and enhancement in the future.

CPRE is an advocate of neighbourhood planning to ensure community engagement in decisions that affect them and their local area. However, we also acknowledge that not all communities are willing to take on what first appears to be a daunting task, without adequate skills to progress the draft policy through to referendum. CPRE can offer support to local communities to engage with Neighbourhood Plans. In the absence of a Neighbourhood Plan, CPRE supports the coverage of the Marton Moss area by a specific chapter in the Local Plan Part 2.

031	Environment Agency	<p>Due to updates, the Council should be aware that our Flood Map for Planning may have changed.</p> <p>Should any new or previously allocated undeveloped sites (which are to be carried forward as part of the Local Plan: Part 2) fall within Flood Zone 2 or Flood Zone 3, a Level 2 Strategic Flood Risk Assessment will need to be carried out to justify those allocations.</p> <p>We recommend that a flood risk policy is included, to cover both site allocations and windfall sites, to ensure that no inappropriate development is permitted in Flood Zone 2 or 3, and that flood risk is not increased elsewhere as a result of the development. The policy could identify any general and/or site-specific mitigation measures that may be necessary.</p> <p>Policies relating to bathing water quality and sustainable drainage systems (SUDs) are not mentioned in the scope of the Local Plan: Part 2. Water quality is a key issue for the Blackpool borough which can be addressed through suitable development management policies to complement Policy CS9: Water Management of the Core Strategy.</p> <p>We recommend a detailed SUDS policy to cover site allocations and windfall sites is included, as SUDs are multifunctional and be used to reduce impacts on water quality in addition to regulating surface water run-off. Green infrastructure can also be incorporated into this policy.</p> <p><u>Contaminated land</u></p> <p>We recommend that a development management policy is included to ensure that there is no risk of pollution to controlled waters from land contamination on previously developed sites.</p>	Comments noted.
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Call for sites

We wish to be consulted on any proposed site allocations which may come forward as part of the call for sites, if they fall within our remit.

SUSTAINABILITY APPRAISAL SCOPING REPORT

Generally, we are pleased to see most of our recommendations have been included in the updated SA report, however the following should be considered:

Flood risk

We note that flood risk is only considered under the Climatic Factors and Energy section. We recommend that this approach is revised as some areas are at risk of flooding without climate change being taken into consideration. This includes areas near the Central Pier and Anchorsholme.

In our previous response dated 10 February 2017 (Ref: NO/2012/103892/SE -01/SP1-L01) we recommended that flood risk should be considered under the Water section.

Additional comments

Table 7-1 SA Objectives, Indicators and Targets (page 36)

15. To protect and enhance the quality of water features and resources and to reduce the risk of flooding - The indicator "Distribution of areas at risk of fluvial flooding (Environment Agency)" should also include tidal flooding.

As previously mentioned, an objective should be included in relation to encouraging the use of SUDS. SUDs are multifunctional and afford other benefits than providing mitigation for climate change.

032	Councillor M Smith	<p>1. Proper bin storage to be considered when planning application are submitted and considered.</p> <p>2. Application for properties with more than one unit should have their own letter box.</p> <p>3. Planning application over a certain value should contain a social value condition with in the application.</p>	<p>Comments noted. All will be considered as part of the development of Part 2.</p>
033	Fylde Borough Council	<p>There appeared to be some issues that are highlighted by the SA Scoping Report which could be covered by policies in the Local Plan Part 2, however, they are actually covered by policies in the adopted Core Strategy.</p> <p>It would be useful, given the two document approach if there was a list of the Core Strategy Policies in the Local Plan Part Two, for cross reference.</p> <p>Page 24 of the SA Scoping Report refers to high levels of household waste production, it is assumed that policy wording will be included on sustainable sourcing and waste management principles. Waste Management principles could be included in the Design Policy.</p> <p>With respect to sustainability, Blackpool is a large urban area which does have potential for Decentralised Energy Networks and District Heating Systems. Page 32 of the SA Scoping Report does highlight that a high proportion of houses do not have central heating, policy wording could be included to address this issue.</p> <p>With respect to the SA Scoping Report on page 28 the final sentence should say – Opportunity to strengthen Blackpool’s role as a sub -regional hub for the Fylde <u>Sub Region</u>. Also the</p>	<p>Comment noted.</p> <p>The Council will provide a list of Core Strategy policies in Part 2 for ease of cross reference.</p> <p>The Council will consider waste management principles in the development of any design policy.</p>

		Fylde Local Plan should be mentioned in the summary of Local Plans, this plan is relevant because it allocates employment land to meet Blackpool's needs and it allocates land for development adjacent to Blackpool's administrative boundary.	
034	I Bagot	<p>Fully agrees with the proposed list of policies. The Town needs change that will benefit all residents, businesses and visitors to boost Blackpool's economy.</p> <p>We must get this project right to protect and encourage every person's future.</p> <p>Comments that Lytham Road is an eyesore. Shops closed poor quality canopies and properties.</p> <p>Action should be taken against Landlords to ensure properties are of a decent standard. The town needs decent living accommodation to house people that are struggling and need a place to live.</p> <p>Bring life back to all areas we know need attending to.</p>	Support noted.
035	M Richardson	<p>Offers no suggested development sites.</p> <p>Support all forms of public transport and agrees with the principles of section 4.1 – Transport GDR</p> <p>It is essential that no development is allowed on any existing transport corridor, notably Waterloo Road through to Bonny Street. Also it is desirable that any future development of the current police station site does not prevent future use of the central area for a tramway connection or shuttlebus route to the football ground and Waterloo Road of by the extension of the south fylde line by said length if made possible.</p>	Comments noted.

When considering infill developments, close to existing transport facilities, there should be a presumption against on-site parking.

Also there should be consideration of 'accumulation' of 'pressure' on existing transport corridors through developments added on to those properties already existing. A good example is the two junctions of Langdale road with Clifton road.